

DEBORAH G. LEVINE
CA State Bar No. 57607
Law Offices of Deborah G. Levine
1299 Newell Hill Place, Suite 300
Walnut Creek, CA 94596
Tel. (925) 933-5100
Fax (925) 933-5297

Attorney for NELDA ASUNCION

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

THE UNITED STATES OF AMERICA,)	No. CR-08-0477 DLJ
)	
Plaintiff,)	STIPULATION AND
)	ORDER FOR
vs.)	PERMISSION TO TRAVEL
)	OUT OF NORTHERN DISTRICT
NELDA ASUNCION,)	
)	
Defendant.)	

The Defendant NELDA ASUNCION, through her counsel, DEBORAH G. LEVINE and Assistant United States Attorney, DEBORAH R. DOUGLAS, do hereby stipulate that Defendant, Nelda Asuncion, be permitted to travel out of the Northern District to Sacramento, California in the Eastern District of California, where she and her husband have family members who they regularly visit. It is further stipulated that Defendant, Nelda Asuncion, be permitted to travel out of the Northern District on or about August 9, 2009 and return on or about September 9, 2009 to visit her son, Erel Asuncion, his wife, Melinda Matta Asuncion, and her grandchildren and other relatives near Chicago, Illinois. Her husband Ernesto Asuncion will be traveling with her. She will be staying at the home of her son, at 303 East Wilshire Dr., Wilmette, IL 60091. The defendant is currently in compliance with the conditions of her pre-trial release. United States Pre-Trial Service Officer Paul Mamaril agrees to this modification of prior orders in order to allow Mrs. Asuncion to visit family in Sacramento without need for further court order and to take a trip to Chicago, Illinois to visit her son. All other release conditions to remain unchanged.

1 For the forgoing reasons, the parties stipulate and agree that Nelda Asuncion be permitted to
2 travel out of the Northern District of California to Sacramento, California with prior pre trial services
3 approval but without the need of further court order and that she be permitted to travel to Chicago,
4 Illinois from August 9, 2009 and return on September 9, 2009 as long as she provides her travel
5 details to pre trial services in advance of the trip.

6 IT IS SO STIPULATED:

7 Dated: July 29, 2009

/s/ Deborah R. Douglas

8 DEBORAH R. DOUGLAS

Assistant United States Attorney

9
10 Dated: July 29, 2009

/s/ Deborah G. Levine

11 DEBORAH G. LEVINE

Attorney for Nelda Asuncion

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13 **ORDER**

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15 UPON STIPULATION OF THE PARTIES AND FOR GOOD CAUSE SHOWN, THE COURT
16 HEREBY AUTHORIZES NELDA ASUNCION TO TRAVEL OUT OF THE NORTHERN
17 DISTRICT OF CALIFORNIA TO SACRAMENTO, CALIFORNIA WITH PRIOR APPROVAL OF
18 PRE TRIAL SERVICES BUT WITHOUT THE NEED FOR ADDITIONAL COURT ORDER. THE
19 COURT ALSO HEREBY AUTHORIZES NELDA ASUNCION TO TRAVEL OUT OF THE
20 NORTHERN DISTRICT OF CALIFORNIA TO WILMETTE, ILLINOIS ON OR ABOUT AUGUST
21 9, 2009 AND RETURN NO LATER THAN SEPTEMBER 9, 2009 TO VISIT HER SON,
22 GRANDCHILDREN AND OTHER RELATIVES NEAR CHICAGO, ILLINOIS. ALL TRAVEL
23 DETAILS SHALL BE PROVIDED TO PRE TRIAL SERVICES BEFORE LEAVING THE
24 NORTHERN DISTRICT. THESE MODIFICATIONS OF CONDITIONS OF PRE TRIAL
25 RELEASE ARE BEING ORDERED SO THAT NELDA ASUNCION CAN VISIT FAMILY
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1 MEMBERS IN SACRAMENTO WITHOUT FURTHER COURT ORDER AND VISIT HER SON
2 AND HIS FAMILY IN CHICAGO, ILLINOIS FROM AUGUST 9, 2009 AND SEPTEMBER 9,
3 2009. ALL OTHER RELEASE CONDITIONS REMAIN UNCHANGED.
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6 IT IS SO ORDERED

7 Dated: August 3, 2009



8 WAYNE D. BRAZIL
9 UNITED STATES MAGISTRATE JUDGE
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